

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

DAVITA M. KEY,

Plaintiff,

v.

HYUNDAI MOTOR
MANUFACTURING, ALABAMA,
LLC; HYUNDAI ENG AMERICA,
INC.; and DYNAMIC SECURITY,
INC.

Defendants.

Case No. 2:19-CV-767-ECM

PLAINTIFF'S MAY USE EXHIBIT 44

Re: Davita Key Statement

From: Ray Cureton (rcureton@dynamicsecurity.org)
To: sspires@dynamicsecurity.org
Cc: tthornton@dynamicsecurity.org; tpeoples@dynamicsecurity.org
Date: Thursday, August 10, 2017 at 03:15 PM CDT

Yes ma'am,

I will document our efforts.

Dr. Ray H. Cureton
District Manager,
Dynamic Security, Inc.

5510 Wares Ferry Rd,
Montgomery, AL 36117
Office - (334) 395-7722
Cell (334) 324-8117

From: Sherry Spires <sspires@dynamicsecurity.org>
To: Ray Cureton <rcureton@dynamicsecurity.org>
Cc: Traci Thornton <tthornton@dynamicsecurity.org>; Tracy Peoples <tpeoples@dynamicsecurity.org>
Sent: Thursday, August 10, 2017 2:48 PM
Subject: Re: Davita Key Statement

Definitely offer her any other job site(s) you have available. Make sure you document everything you offer her even if she refuses it.

Thanks,
Sherry

From: Ray Cureton <rcureton@dynamicsecurity.org>
To: Sherry Spires <sspires@dynamicsecurity.org>
Cc: Traci Thornton <tthornton@dynamicsecurity.org>; Tracy Peoples <tpeoples@dynamicsecurity.org>
Sent: Thursday, August 10, 2017 2:13 PM
Subject: Re: Davita Key Statement

Hi Sherry,

The non-uniformed working in the mail room, was Ms. Key's perception of something Cassandra Williams told her when she showed Ms. Key the HMMA hair policy.

Ms. Williams DID ask that Ms. Key be removed from the site.

I have not assigned Ms. Key to another site because she has not agreed to work at the pay rate or times that I actually need someone to work.

Lastly, in light of her current complaint, am I free to offer her a position with Dynamic should we be able to agree on a place for her to work?

Thanks all for your help on this.

Dr. Ray H. Cureton
District Manager,
Dynamic Security, Inc.

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Montgomery, AL 36117
Office - (334) 395-7722
Cell (334) 324-8117

From: Sherry Spires <sspires@dynamicsecurity.org>
To: Ray Cureton <rcureton@dynamicsecurity.org>
Cc: Traci Thornton <tthornton@dynamicsecurity.org>; Tracy Peoples <tpeoples@dynamicsecurity.org>
Sent: Wednesday, August 9, 2017 9:23 AM
Subject: Re: Davita Key Statement

I thought we determined that her hair style was not an issue at HMMA since she was "non uniformed", working in the mail room.

Did our client contact at HMMA request that she be removed from their job site? Is she still working for us or was she moved to another job site? It appears she's got her mind made up that she was removed because of her pregnancy. Did she ever provide anything from her doctor indicating what her lifting limits are. I know that was an issue as well as the hair.

As always, keep good notes/documentation in her file because we've probably not heard the end of this.

Sherry

From: Ray Cureton <rcureton@dynamicsecurity.org>
To: Sherry Spires <:sspires@dynamicsecurity.org>
Cc: Traci Thornton <tthornton@dynamicsecurity.org>; Tracy Peoples <tpeoples@dynamicsecurity.org>
Sent: Tuesday, August 8, 2017 1:26 PM
Subject: Davita Key Statement

Hi Sherry,

Davita Key came into the office this morning, and, under my, and Nicole's supervision, reviewed the memo written by Account Manager Robinson concerning Ms. Key's removal from Hyundai.

Ms. Key then went on to write a rebuttal to the memo which I have attached to this e-mail along with the memo from Ms. Robinson, the statement from Ms. Howell, and Ms. Key's original complaint.

Much of this latest statement from Ms. Key consists of slightly differing recollections of events over a couple of days period.

After reading the statement, I believe that Ms. Key is trying to imply that she was removed from the site because she was pregnant, and not just because her hair was out of compliance with the rules.

Also, Ms. Key is taking strong exception to both Gloria Robinson's, and Cassandra Williams' manner toward her.

She requested that I forward her statement to "HR" and that is what I am doing.

I'm not sure what action Ms. Key expects us to take, but please advise concerning any other steps you need me to take.

Dr. Ray H. Cureton
District Manager,
Dynamic Security, Inc.

5510 Wares Ferry Rd,
Montgomery, AL 36117
Office - (334) 395-7722
Cell (334) 324-8117

----- Forwarded Message -----

From: Ray Cureton <rcureton@dynamicsecurity.org>
To: Ray Cureton <rcureton@dynamicsecurity.org>
Sent: Tuesday, August 8, 2017 1:22 PM
Subject: Message from "RNP002673A95134"

This E-mail was sent from "RNP002673A95134" (MP C4503).

Scan Date: 08.08.2017 13:24:47 (-0400)
Queries to: richard@absofficesystems.com



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